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CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

COURT FILE NO.:

13-CV 2839 JNE FLN

DALE MONTGOMERY

Plaintiff,

COMPLAINT

WITH JURY TRIAL

V.

DEMAND

Pinnacle Credit Services et al

MOTION FOR ENTRY OF DEFAULT JUDGEMENT

TO THE HONORABLE JUDGE OF THIS COURT.

The plaintiff Dale Montgomery, comes before this court with this Motion for Entry of Default Judgment against Pinnacle Credit Services, and states as follows:

1. I am the Prose Plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter. Plaintiff has made all filings required by this court to bring a cause of action against the Defendant Pinnacle Credit Services, for damages under the FCRA 15 USC 1681 et seq, Telephone Consumer Practices ACT 47 U.S.C. §227(b)(3)(A), FDCPA, 15 U.S.C. §1692, MFDCPA 332.33-355- 332.37
2. Plaintiff has made proper service of the summons and complaint to the defendant as Pinnacle Credit Services evidenced by the proof of mailing.
3. The time for the defendant to respond is past and there has been no response to the service of summons and complaint in this matter and defendant is therefore in default.

4. Plaintiff has made a request for Clerks entry of default judgment and it was granted on November 21, 2013.

Wherefore, the Plaintiff respectfully moves the court to enter an order of default judgment against the defendant, Pinnacle Credit Services in the amount of \$6000.00 for statutory damages as well as the cost to bring this action as stated in the annexed bill of cost and for which let execution issue.

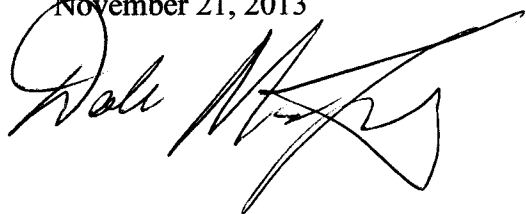
Respectfully Submitted

Dale Montgomery

12131 Paris Ave N

Stillwater, MN 55082

November 21, 2013

A handwritten signature in black ink, appearing to read "Dale Montgomery", with a large, stylized flourish extending from the end of the name.